

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WILLIAM M. BYRD,

Plaintiff,

v.

Civil Action No. 04-11032-DPW

AVENTIS PHARMACEUTICALS, INC.
and DEBRA EDMUNDS,

Defendants.

INITIAL DISCLOSURES OF DEFENDANTS, AVENTIS PHARMACEUTICALS, INC.
and DEBORAH EDMUNDS, PURSUANT TO LOCAL RULE 26.1(B)

I, Deborah Edmunds on behalf of myself as an individual defendant and on behalf of Aventis Pharmaceuticals, Inc. ("Aventis"), on oath, depose and say as follows:

1. The persons who Defendants know or believe to have discoverable information relevant to Defendants' defenses to the allegations in Plaintiff's complaint include:

A. Deborah Edmunds
c/o Legal Department
Aventis Pharmaceuticals
300 Somerset Corporate Boulevard
PO Box 6977
Bridgewater, NJ 08807-0977

Ms. Edmunds has knowledge of Plaintiff's performance, her evaluations of Plaintiff's performance, her discussions with Plaintiff about those evaluations, the warnings given to Plaintiff, her discussions with Plaintiff about those warnings, the decision to terminate Plaintiff's employment and her communication with Plaintiff regarding the termination of his employment.

B. Christine List
c/o Legal Department
Aventis Pharmaceuticals
300 Somerset Corporate Boulevard
PO Box 6977
Bridgewater, NJ 08807-0977

Ms. List has knowledge of Plaintiff's performance, evaluations of Plaintiff's performance, her discussions with Plaintiff regarding Plaintiff's disagreement with a performance evaluation, the warnings given to Plaintiff, the decision to terminate Plaintiff's employment and Aventis' policies. She also has knowledge regarding the decisions to give Plaintiff written warnings and the decision to terminate Plaintiff's employment.

C. Mailet Minassian
c/o Legal Department
Aventis Pharmaceuticals
300 Somerset Corporate Boulevard
PO Box 6977
Bridgewater, NJ 08807-0977

Ms. Minassian has knowledge regarding the evaluations of Plaintiff, the written warnings given to him and his disagreement with them, and Defendant Aventis' employment policies.

2. Defendant Aventis discloses that in its possession are documents relating to this matter, including Plaintiff's personnel file, human resources records relating to Plaintiff's performance, performance evaluations and Plaintiff's concerns about a performance evaluation, some e-mail correspondence and notes relating to these issues, some reports relating to Plaintiff's call activities and expense reports, several Aventis human resources policies at issue in the case, as well as documents filed with the MCAD in connection with Plaintiff's MCAD Charge. Aventis also discloses that it has several documents that are subject to the attorney-client privilege.

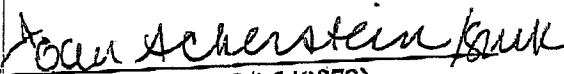
3. Defendants disclose that there is no insurance coverage available for this claim.

Signed under the pains and penalties of perjury based on personal knowledge, or information and belief if compiled by others.


Deborah Edmunds

Respectfully submitted,

AVENTIS PHARMACEUTICALS, INC.
and
DEBORAH EDMUNDS
By their attorneys,


Joan Ackerstein (BBO# 549872)
Samia M. Kirmani (BBO#634699)
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Dated: 7/7/04